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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

PETER VELASCO, *et al.*,

Plaintiffs,

v.

CHRYSLER GROUP LLC,

Defendant.

Case No. 2:13-cv-08080-DDP (VBKx)

**NOTICE OF MOTION AND MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS SETTLEMENT**

Date: July 20, 2015

Time: 10:00 a.m.

Judge: Hon. Dean D. Pregerson

Courtroom: 3

**PLEASE TAKE NOTICE** that on July 20, 2015 at 10:00 a.m., or as soon thereafter as this matter may be heard, before the Honorable Dean D. Pregerson, in Courtroom 3, 312 North Spring Street, Los Angeles, California, Plaintiffs Marcos Galvan, Philip Lightfoot, Jimmy Pat Carter, Jacqueline Young, Bradford Soule, and Elizabeth Dillon will and hereby do move for an order granting preliminary approval of the parties' proposed class settlement, conditionally certifying a settlement class, appointing Plaintiffs as class representatives and their attorneys as class counsel, direction dissemination of the proposed class notice, and setting a fairness hearing to determine whether the settlement should be granted final approval.

Plaintiffs' Motion is based on this Notice of Motion and Motion; the accompanying Memorandum in Support; Declaration of Eric H. Gibbs and its attachments (including the Settlement Agreement); and all other papers filed and proceedings had in this action. This motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on May 29, 2015.

Dated: June 10, 2015

Respectfully submitted,

**GIRARD GIBBS LLP**

By: /s/ Eric H. Gibbs

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